

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re: :  
: PROMESA  
THE FINANCIAL OVERSIGHT AND : Title III  
MANAGEMENT BOARD FOR PUERTO RICO, :  
: Case No. 17 BK 3283-LTS  
as representative of :  
: (Jointly Administered)  
THE COMMONWEALTH OF PUERTO RICO, *et* :  
*al.*, : This filing relates to HTA and  
: ERS.  
Debtors :  
:

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2019 JUN 26 PM 2:15  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
SAN JUAN, P.R.

**RESPONSE TO THIRTY-NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF  
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS**

I would like to file a formal response to the Omnibus Objection for case: 17-03283-LTS. I, Joe M. Pace (as shown in item 66, on page 10 of exhibit A- Deficient), am the owner of the referenced Employees Retirement System of the Government of the Commonwealth of Puerto Rico bonds that are subject to case number 17 BK 03566-LTS, Claim # 5427. I have owned the subject bonds in my personal investment account since January of 2013.

According to Exhibit A of the Thirty - Ninth Omnibus Objection, the Proof of claim purports to assert liabilities associated with bond(s) and/or money loaned, but fails to provide any basis or supporting documentation for asserting a claim against ERS, such that Debtors are unable to determine whether claimant has valid claim against ERS or and of the other Title III debtors.

As noted above, I have owned the referenced bonds since January 2013, and continue to own said bonds. I have attached for your reference the original trade confirmation along with a portion of my most recent brokerage statement which demonstrates continued ownership of the bonds.

As you have requested, I have served the Court of Clerk's office, the Oversight Board, and Creditors' Committee, via Federal Express, at the following addresses:

Clerk's Office  
United States District Court  
Room 150 Federal Building  
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board  
Proskauer Rose LLP  
Eleven Time Square  
New York, New York 10036-8299  
Attn: Martin J. Bienentock

Counsel for the Creditor's Committee  
Paul Hastings LLP  
200 Park Avenue  
New York, New York 10166  
Attn: Luc A. Despins  
James Bliss  
James Worthington  
G. Alexander Bongartz

Please let me know if any additional documentation is necessary. I can be reached using the contact information below.

Sincerely,

A handwritten signature in black ink that reads "Joe Pace". The signature is written in a cursive, flowing style.

Joe M. Pace  
8316 Snug Hill Lane  
Potomac Maryland 20854  
301-526-6718  
Joepace3@gmail.com